

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

PATRICIA COSGROVE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
NEW SEABURY RESOURCES	)	<b>Civil Action No.</b>
MANAGEMENT, INC.,	)	<b>1:05-cv-10791-GAO</b>
	)	
Defendant.	)	
	)	

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)**

Counsel for the parties to the above-captioned matter conferred on October 27, 2005, and now file this joint statement pursuant to Local Rule 16.1(d) and the Court's Notice of Rescheduling Scheduling Conference dated October 18, 2005.

**I. Proposed Pretrial Schedule:**

A. Discovery

The parties agree that all discovery shall be limited in accordance with Fed. R. Civ. P. 26(b) and Local Rule 26.1(c). The parties further agree on the following proposed joint discovery plan:

Plaintiff's disclosure of expert information will be completed no later than January 31, 2006.

Defendant's disclosure of expert information will be completed no later than February 28, 2006.

Discovery will be completed no later than April 30, 2006.

The parties do not believe that phased discovery is necessary in this case.

B. Motions

The parties propose that any dispositive motions shall be filed no later than May 31, 2006.

C. Final pretrial conference and trial date to be scheduled by the Court.

II. **Trial By Magistrate Judge**

Plaintiff does not consent to trial by a Magistrate Judge.

III. **Certifications**

The parties will file their respective certifications pursuant to Local Rule 16.1(d)(3) under separate cover.

IV. **Settlement Proposal**

Pursuant to Local Rule 16.1(c), Plaintiff submitted a written settlement proposal to Defendant on October 27, 2005.

Respectfully submitted,

FOR DEFENDANT  
NEW SEABURY RESOURCES  
MANAGEMENT, INC.,

s/Howard I. Wilgoren  
Howard I. Wilgoren, BBO #527840  
6 Beacon Street, Suite 700  
Boston, MA 02108  
(617) 523-5233

FOR PLAINTIFF  
PATRICIA COSGROVE,

s/Shannon Liss-Riordan  
Shannon Liss-Riordan, BBO #640716  
Hillary Schwab  
Pyle, Rome, Lichten, Ehrenberg &  
Liss-Riordan P.C.  
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(617) 367-7200

Date: October 31, 2005

Date: October 31, 2005